

CSBG Recovery Act Local Plan Questions and Answers

Section I: Agency Information

No Questions submitted to date

Section II: Certification

Q: The certification section indicates to check the “box” to acknowledge that the agency is aware of the separate tracking and reporting requirements. However, there is not a check box. How does an agency place a check mark to make this acknowledgement?

A: It was recently brought to CSD’s attention that the acknowledgment “box” does not show up on this version of the plan. Please physically write in a “box” and check it to acknowledge your agency’s understanding of this requirement.

Q: If a governing board’s approval is not available prior to the due date, can an agency still submit the Local Plan without the Chair of the Board’s signature?

A: Yes, your agency can still submit the Local Plan by the due date of May 11, 2009. The Local Plan will be signed by the Director of your Agency (Executive Director). Once the Local Plan has been reviewed and approved by the Board, follow up with the official certification by the Chair of the Board.

Section III: DUNS Number

Q: In order to utilize our county’s DUNS numbers and CCR (CAGE Code) number we must receive approval from the Board of Supervisors. This approval is not available until May 19. Should we submit our plan without these numbers then submit once available?

A: Submit your plan as required on May 11, 2009, by 5:00 p.m. and include an explanation on the omission of the DUNS and/or CAGE Code. CSD suggests submitting verification of registration on CCR and pending approval from the Board of Supervisors. Submit the DUNS and CAGE Code upon approval from the Board of Supervisors.

Section IV: CCR

Q: How can an agency locate its CCR number after registration?

A: New information has been provided to CSD regarding registration in the Central Contractor Registration (CCR). It is a federal requirement that recipients of the Recovery Act funds must maintain a current registration in the CCR. CSD indicated on the CSBG Recovery Act Plan that agencies would need to submit

their CCR number. However, after further research, it has been identified that registration in the CCR does not create a unique CCR number. For the purposes of verifying registration in the CCR, we ask that you provide a Commercial and Government Entity (CAGE) Code. This code will be supplied after registration in the CCR is complete.

It is important to note that registration must be renewed and revalidated at least every 12 months from the date you previously registered. If you do not renew your registration, it will expire.

Please call CCR Helpdesk (1-888-227-2423) directly for any difficulties you may incur when registering on the site.

Q: Is the CCR number the same as our TPIN number?

A: No, the CCR number is not the same as a TPIN number.

Q: What is the number that must be submitted instead of the CCR Number?

A: The correct term is "CAGE Code."

Q: I have successfully registered in CCR but when I check my status it still says pending approval and the CAGE Code is not available yet. Can I just submit a copy of that page showing I have successfully registered and am awaiting the CAGE Code?

A: Yes, submit a copy of the page showing successful registration in CCR and pending approval of CAGE Code. Submit the CAGE Code to CSD upon receipt of the code.

Section V: Verification of Public Inspection

Q: Does an agency have to solicit public comments?

A: The Recovery Act Local Plan does not require solicitation of public comment.

Although it is not required Agencies are expected to post the Recovery Act Local Plan for public inspection. Therefore, as a good faith effort consider ways to allow public comment to your plan. In the spirit of Transparency, your community needs to be informed of how the ARRA funds will be spent. Comments may provide valuable input into the final ARRA program.

Q: In case we encounter technical difficulties with our website, can you give us any other options that will meet the requirements for public inspection?

A: In the event, technical difficulties prevent an agency from posting the

Recovery Act Local Plan on their website some alternatives would be to announce in the local newspaper or radio station the availability of the recovery act local plan for public inspection or email blasts to local community based organizations. These are just a few options and do not preclude other alternatives.

Q: Can the plan be posted on May 11, 2009?

A: Yes, the plans can be posted on May 11, 2009, and remain on the Agency's website for public inspection. This will demonstrate a good faith effort by the agencies and transparency. Also, agencies may want to accept comment during this time which may lead to changes to the final plan.

Section VI: General Plans

No Questions submitted to date

Section VII: Energy Coordination

Q: What is meant by Energy Coordination? If an agency operates independently of an energy assistance provider, how does its Plan incorporate any energy plans?

A: Although your agency does not operate an energy program, this does not prohibit contacting your local energy provider to begin conversations on coordination. CSD is strongly encouraging coordination between the CSBG Network and local energy providers or within your own energy program. Energy providers will have a myriad of job training and placement opportunities as a result of the Recovery Act funds they received. This is a great opportunity for the CSBG Network to link up with local energy providers or in-house energy programs to take full advantage of any resources/partnerships that are available. CSD will encourage the service provider network to communicate, meet with and partner with, when applicable, with other CSBG network providers in their service area for the purpose of maximizing coverage and resource allocations.

A listing of the local energy service providers is available on the CSD website at www.csd.ca.gov.

Section VIII: Workforce Development Projects and Activities

Q: What is the definition of job created and job retained? Is the agency able to show a partial job created or retained?

A: "Jobs or positions created" means those new positions created and filled, or previously existing unfilled positions that are filled, as a result of Recovery Act funding.

"Jobs or positions retained" means those previously existing filled positions that are retained as a result of Recovery Act funding.

Note: A job cannot be reported as both created and retained.

At a minimum, this estimate shall include any new positions created and existing filled positions that were retained to support or carry out Recovery Act projects of activities managed directly by the recipient, and sub-recipients.

The number needs to be expressed as “full-time equivalent” (FTE), calculated cumulatively as all hours worked divided by the total number of hours in a full-time schedule, as defined by the recipient.

For instance, two full-time employees and one part-time employee working half days would be reported as 2.5 FTE.

Q: Are there any guidelines on the number of jobs that must be created/retained for the allocation?

A: Currently, there are no specific guidelines on the required number of jobs that must be created and/or retained using Recovery Act funds. The number of jobs should correspond to the amount of funding received.

Q: If an agency is sustaining/retaining a job, can it include program costs (i.e., The agency hires a new employee. Can the agency purchase a new computer for the employee with ARRA funds?)

A: Yes, you can include those costs associated with retaining or creating a job.

Q: When estimating costs associated with projects, should an agency consider the term of the contract or the total cost of the project (extending past the contract)?

A: Projects funded through the Recovery Act should be for 15 months; but please keep in mind that you will need to be addressing sustainability after the funding ends.

Q: An agency has not finalized its competitive solicitation for its subcontracted project. Does it still report this information and if so, what information does it put in section B for subcontractors?

A: If your agency has identified projects and activities that will be subcontracted, but have not awarded a contract to the subcontractor please include what information is known about the project to date (i.e., title of the project/activity, cost, est. number of jobs and a description). If the contract has not been formally awarded, please enter TBD (to be determined) for the subcontractor name.

Q: What does the term “infrastructure investment” mean?

A: CSD continues to seek guidance on the terms of infrastructure investments. What is clear is that infrastructure as it relates to CSBG does not mean capital improvements and or construction. The CSBG statute and OCS Information Memorandum 60 prohibits such activity. For infrastructure investments, the agency will need to explain how the infrastructure investment will contribute to one or more purposes of the Recovery Act.

Q: What does the term “administrative cost” encompass?

A: Administrative costs are those costs, which are directly related to the administration of the ARRA contract. The same definitions and parameters that apply to your regular CSBG funding apply to the Recovery Act funds.

Q: An agency is spending part of its money on administrative costs? How does the agency demonstrate that it allocated the costs to a measurable outcome?

A: Administrative costs should be associated with one of the projects and activities being undertaken by an agency. An agency should tie administrative costs directly to an outcome of a project or activity.

If you check “YES” in E, you will need to explain how the funds are tracked in relation to the outcome. There has to be a direct connection between any administrative costs to a program developed with the ARRA funds.

Q: If we plan to use the funding to retain administrative positions, must we include all NPI information in the plan?

A: The Agency must identify the outcome(s) associated with the use of Recovery Act funds, even if funds are administration cost.

Section IX: Required Disclosures

Q: Are public agencies required to disclose legal proceedings and unresolved findings for the entire government body?

A: The required disclosures apply to any entity or officers under the authority of the tri-partite board.

Additional Questions

Q: If the plan is submitted via email by 5:00 pm May 11, 2009, will this suffice to meet the deadline for plan submission? Is a hard copy still required and if so, when must it be received by the CSD?

A: Yes, email submittal by 5:00 p.m. on Monday, May 11, 2009, meets the submission requirement. No hardcopy is required if submitting the plan via

email.

Q: Can an agency select a contractor without going through the competitive bidding process?

A: Currently, according to the OMB, all contracts must be achieved using a competitive bidding process. No Recovery Act guidance has overridden this requirement. Please utilize your agency's current procurement policy to acquire subcontractors.

Although the Recovery Act calls on agencies to commence expenditures and activities as quickly as possible consistent with prudent management, this statement, by itself, does not constitute a sufficient justification to support award of federal grants on a non-competitive basis.

Q: Can an agency utilize its current contracts to support Recovery Act projects or would it need separate contracts for Recovery Act projects?

A: We ask that you review your agency's purchasing/procurement policies. If your agency's policies allow for a current contract to be amended for time or funds, then you may do so to capture projects and activities supported under the Recovery Act.

Because Recovery Act funds must be tracked and accounted for separately, supplements to existing grants are not recommended as there is a greater risk that the grant recipient will be unable to track and report Recovery Act funds separately.

Agencies must ensure that separate tracking is feasible under whichever system the agency selects.

Q: Is the 200% poverty criteria in effect? Can an agency begin instituting the 200% of poverty criteria its Recovery Act contract?

A: Although the Recovery Act allows States to raise the poverty guideline to 200%; California's current poverty guideline remains at 100%. Upon receipt of any changes to this provision, the Network will be notified.

Q: Can federal ARRA funds be used as match for another federal program?

A: CSBG is not authorized to use funding as a match to another federal program. According to 45 CFR, subtitle A, section 74.23 cost sharing or matching funds cannot be paid by the Federal Government under another federal award, except where authorized by Federal statute to be used for cost sharing or matching. The CSBG statute does not authorize an exception for cost sharing or matching.

Q: Are we using the EARS to do our report for the ARRA?

A: Yes, all expenditure reports for the ARRA funds will be submitted via EARS (Expenditure Activity Reporting System)

Q: Will CSD form 425 S be used to prepare ARRA budget the budget summary?

A: CSD will be using the 425. S. form to prepare the ARRA budget, at this time the forms have not been revised to capture specific information related to tracking the ARRA funds.

Q: When will we receive the ARRA advance?

A: The advance payment is contingent on the contract being fully executed.

Q: If we submitted a hard copy via mail but could not check Section II Q: #1. Do we send a corrected copy and resubmit?

A: No, Email CSD at CSBGRecovery@csd.ca.gov stating that you agree with Section II Q: 1. In the Subject Line please follow the following format:

Subject: Agency Name, Approval of Section II, Q: 1